KENNEDY P. RICHARDSON, Cal. Bar No. 62516 DAVID M. ROSENBERG-WOHL, Cal. Bar. No. 132924 2 MARION'S INN LLP 1611 Telegraph Avenue, Suite 707 Oakland, Čalifornia 94612-2145 Telephone: (510) 451-6770 4 Facsimile: (510) 451-1711 Email: <u>kpr@marionsinn.com</u> 5 drw@marionsinn.com 6 Attorneys for Defendant KAISEŘ FOUNDATION HEALTH PLAN, INC. 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION 11 **LUCY JOSON** Case No. C V11-01018 JW 12 STIPULATION TO CONTINUE CASE Plaintiffs, MANAGEMENT CONFERENCE AND 13 **DEPENDENT DATES** VS. 14 [AND PROPOSED ORDER] KAISER FOUNDATION HEALTH PLAN, 15 INC.; and Does 1 through 50, inclusive; 16 Defendants. 17 18 19 20 21 22 23 24 25

DISTR DENIEI Judge James Ware

Due to the fact that plaintiff's first amended complaint has just been filed and served (Document No. 14, May 24, 2011) and that defendant has until July 25, 2011 to respond (Stipulation and Order, Document No. 11, May 20, 2011), the parties here stipulate to continue the Case Management Conference continued by this Court to July 11, 2011 (from June 20, 2011) (Document No. 15, June 15, 2011), as well as the dependent date of filing a Joint Case Management Conference Statement by July 1, 2011 (Document No. 16, June 15, 2011). This stipulation is made at suggestion of the clerk of the Court in order to make the case management and preceding meet and confer process meaningful, since requiring the process before defendant

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1 has made its response is unlikely to be fruitful; it is made pursuant to the Court's Standing Order 2 Regarding Case Management in Civil Cases. 3 In light of the timing of defendant's response, as well as the schedule of the Court, the 4 new case management conference date shall be Monday, October 17 at 10:00 a.m. at the United 5 States Courthouse, 450 Golden Gate Avenue, San Francisco, California. As a consequence, the 6 7 parties are to meet and confer regarding the matters of Rule 26(f)(2) on or before Monday, 8 September 26, 2011, and the date of initial disclosure under Rule 26(a) shall be on or before 9 Monday, October 10, 2011. 10 11 12 DATED: June 15, 2011 MARION'S INN LLP 13 14 David M. Rosenberg-Wohl 15 Attorneys for Defendant KAISER FOUNDATION HEALTH PLAN, INC., 16 17 DATED: June 15, 2011 STEVEN P. COHN, ESQ. ADVOCACY CENTER FOR EMPLOYMENT 18 LAW 19 20 /s/ by D. Rosenberg-Wohl Steven P. Cohn 21 Attorneys for Plaintiff LUCY JOSON 22 23 SO ORDERED 24 DATED: June , 2011 James Ware 25 United States District Chief Judge 26 27 28